

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Bell Telephone Company	)	
	)	98-0252
Application for Review of Alternative Regulation Plan	)	(consol.)
	)	
Illinois Bell Telephone Company	)	
	)	98-0335
Petition to Rebalance Illinois Bell Telephone Company's	)	(consol.)
Carrier Access and Network Access Line Rates	)	
	)	
Citizens Utility Board and the People of the State	)	
of Illinois	)	
vs.	)	00-0764
Illinois Bell Telephone Co., d/b/a Ameritech, Illinois	)	(consol.)
	)	
Petition for reduction in rates and other relief	)	

**GCI's Errata to GCI's Pretrial Memo**

The Pretrial Memo submitted by GCI (the People of the State of Illinois, ex rel. James Ryan, Attorney General, the Cook County State's Attorney's Office, City of Chicago and the Citizens Utility Board (Government and Consumer Intervenors)), erroneously and inadvertently omitted one entry in the Revenue Requirements section, i.e. for the Cost of Capital. The attached page 14 corrects that omission in the Revenue Requirement Analyses section.

In addition, an internal note to insert page numbers was inadvertently left on the document on page 8. A replacement page 8, minus that reference, is attached.

Respectfully submitted:

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Corporation Counsel

THE PEOPLE OF THE STATE OF ILLINOIS  
James E. Ryan, Attorney General

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February 7, 2001

b. Recommend that service quality penalties be assessed out of the index

a. Penalty of \$12 million per violation  
**TerKeurst, GCI Ex. 2.0 at 70, TerKeurst, GCI Ex. 12.0**

b. Escalation for multiple violations  
**TerKeurst, GCI Ex. 2.0 at 71, TerKeurst, GCI Ex. 12.0**

c. Direct consumer compensation  
**TerKeurst, GCI Ex. 2.0 at 81-88; TerKeurst, GCI Ex. 12.0 at 53-62**

## II. COST STUDY ISSUES

**Dunkel, GCI Exhibits 8.0 and 9.0; Regan, GCI Exhibits 5.0 and 10.0; and McCullar, GCI Exhibit 4.0**

### A. Shared Costs

1. Ameritech's proposal violates the ICC's Cost of Service Rules  
**Dunkel, GCI Ex. 8.0 at 67-68**

2. Ameritech's proposal violates the Federal Telecommunications Act of 1996  
**Dunkel, GCI Ex. 8.0 at 80**

3. Ameritech admits that the loop is shared by many services  
**Dunkel, GCI Ex. 8.0 at 60-65**

### B. Utilization

1. Ameritech's proposal violates the ICC's Cost of Service Rules- "usable capacity of a capital resource"  
**Dunkel, GCI Ex. 8.0 at 84**

2. Ameritech improperly adjusts the utilization factor for NAL costs but not usage costs  
**Dunkel, GCI Ex. 8.0 at 85-86**

### C. Ameritech's Claimed Loop and Port Facility LRSICs contain several errors

1. Overstating the "local field costs"  
**Dunkel, GCI Ex. 9.0 at 45-47**

2. 100% switching equipment common cost allocated to loop and port  
**Dunkel, GCI Ex. 9.0 at 47-50**

3. Cost of capital

a. Capital structure

**Cross examination: Freetly, Staff Ex. 11 and 25  
Ibbotson, Ameritech Ex. 6**

b. Cost of common equity

**Cross examination: Freetly, Staff Ex. 11 and 25  
Ibbotson, Ameritech Ex. 6  
Avera, Ameritech Ex. 8.0, 8.1, 8.2**

The foregoing represents the Pretrial Memo of GCI. Additional issues, issues that arise in Surrebuttal, and issue that arise in hearings and additional citations to the evidence may be included in the briefs of the individual GCI parties.

Respectfully submitted:

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corrected February 7, 2001

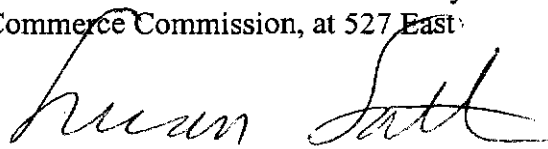
**STATE OF ILLINOIS**

**ILLINOIS COMMERCE COMMISSION**

Illinois Bell Telephone Company	)	
Application for Review of Alternative	)	
Regulation Plan	)	
	)	Docket No. 98-0252
	)	
Illinois Bell Telephone Company	)	
	)	
Petition to Rebalance Illinois Bell	)	
Telephone Company's Carrier Access and	)	98-0335
Network Access Line Rates	)	(Consolidated)

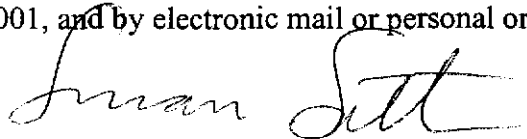
**NOTICE OF FILING**

**PLEASE TAKE NOTICE** that on this date, February 7, 2001, we have filed with the Chief Clerk of the Illinois Commerce Commission the enclosed GCI'S Errata to GCI's Pretrial Memo in the above-captioned docket by delivering it to United Parcel Service for next day delivery for Donna Caton, Chief Clerk of the Illinois Commerce Commission, at 527 East Capitol Avenue, Springfield, Illinois 62794.

  
\_\_\_\_\_  
Susan L. Satter  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I, Susan L. Satter, an Assistant Attorney General, hereby certify that I served the above identified documents upon all active parties of record on the attached service list by United States Mail, first class postage prepaid on February 7, 2001, and by electronic mail or personal or fax delivery to parties indicated by an asterisk (\*).

  
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